

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: FLINT WATER CASES.

Case No. 5:16-cv-10444-JEL-EAS

This Document Relates To:

(Consolidated)

All Cases.

Hon. Judith E. Levy

**DEFENDANTS VEOLIA WATER NORTH AMERICA OPERATING
SERVICES, LLC’S, VEOLIA NORTH AMERICA, INC.’S, AND VEOLIA
NORTH AMERICA, LLC’S PROPOSED AGENDA ITEM FOR THE
MARCH 20, 2024 STATUS CONFERENCE**

Pursuant to the Court’s order setting a status conference for March 20, 2024 and requesting that the parties file proposed agenda items, ECF No. 2835, Defendants Veolia Water North America Operating Services, LLC, Veolia North America, Inc., and Veolia North America, LLC (“VNA”) propose the following agenda item for the status conference:

1. **Bellwether 3 Expert Depositions & Daubert Deadlines.** For the Bellwether 3 trial, the deadline for expert depositions is March 15, 2024. The Daubert motion deadline is March 22, 2024. The parties are cooperating on scheduling of expert depositions. However, VNA wishes to advise the Court that seven expert depositions are scheduled on or after the March 15th deadline (Drs. Bithoney, Greenberg, Hoffman, Huber, McCaffrey, Putnam, and Sample). An additional six experts will likely be deposed after the March 15th deadline (Drs. Banner, Benson, Finley, Nelson, Segreve, and Weed). As to Drs. Bithoney, Sample, and Hoffman only, VNA requests that the Daubert motion deadline be amended from March 22nd, to 10 days after the conclusion of the expert’s deposition. As to the remainder of Plaintiffs’ experts, the March 22nd Daubert deadline would still apply. VNA would not oppose a similar amendment if

requested by Plaintiffs as to VNA experts being deposed on or after the expert deposition deadline.

The parties are discussing this issue, and will advise the Court if party agreement is reached in advance of the conference.

DATED: March 6, 2024

Respectfully submitted,

CAMPBELL CONROY &
O'NEIL, P.C.

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CERTIFICATE OF SERVICE

I, James M. Campbell, hereby certify that on March 6, 2024 I electronically filed the foregoing document with the Clerk of the Court using the ECF System, which will send notification to the ECF counsel of record.

Respectfully submitted,

/s/ James M. Campbell

James M. Campbell